

**FILED**

**MAY 08 2019**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

U.S. DISTRICT COURT  
BAY CITY, MICHIGAN

UNITED STATES OF AMERICA,

CASE NO: 18-CR-20523

Plaintiff,

HON. THOMAS L. LUDINGTON  
United States District Judge

v.

JAVONTEA ANTONIO-JAMEEL BANKS,

HON. PATRICIA T. MORRIS  
United States Magistrate Judge

Defendant.

---

**FIRST SUPERSEDING INDICTMENT**

---

**THE GRAND JURY CHARGES:**

**COUNT ONE**  
**SEX TRAFFICKING OF CHILDREN**  
**(18 U.S.C. §§ 1591(a) and 2)**

Beginning in or about June 2016 and continuing through approximately August 19, 2016, in the Eastern District of Michigan, JAVONTEA ANTONIO-JAMEEL BANKS knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, in and affecting interstate and foreign commerce, Minor Victim 1 (MV-1), then a 15-year-old female, and benefited financially and received anything of value from participation in a venture engaged in such acts, knowing, and in reckless disregard of the fact, and having had a

reasonable opportunity to observe MV-1, that MV-1 had not attained the age of 18 years, and would be caused to engage in a commercial sex act, in violation of 18 U.S.C. §§ 1591(a) and 2.

**COUNT TWO**  
**SEX TRAFFICKING OF CHILDREN**  
**(18 U.S.C. §§ 1591(a) and 2)**

Beginning in at least 2015 and continuing through approximately January 2017, in the Eastern District of Michigan and elsewhere, JAVONTEA ANTONIO-JAMEEL BANKS knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, in and affecting interstate and foreign commerce, Minor Victim 2 (MV-2), a 15-17 year-old female during the relevant time periods, and did benefit financially and received anything of value from participation in a venture engaged in such acts, knowing, and in reckless disregard of the fact, and having had a reasonable opportunity to observe MV-2, that MV-2

had not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of 18 U.S.C. §§ 1591(a) and 2.

**THIS IS A TRUE BILL.**

MATTHEW SCHNEIDER  
United States Attorney

Dated: May 8, 2019

s/GRAND JURY FOREPERSON

s/CHRISTOPHER W. RAWSTHORNE  
CHRISTOPHER W. RAWSTHORNE  
Assistant United States Attorney  
WI State Bar ID #1059889  
600 Church Street  
Flint, Michigan 48502-1280

s/ANTHONY P. VANCE  
ANTHONY P. VANCE  
Assistant United States Attorney  
Chief, Branch Offices

**Companion Case information MUST be completed by AUSA and initialed.**

United States District Court Eastern District of Michigan	<b>Criminal Case Cover Sheet</b>	<b>Case Number</b> 18-CR-20523
--	----------------------------------	-----------------------------------

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	<b>Judge Assigned:</b>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>AUSA's Initials:</b> CWR

**Case Title:** USA v. JAVONTEA ANTONIO-JAMEEL BANKS**County where offense occurred :** SAGINAW**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**☐ Indictment/ ☐ Information --- no prior complaint.☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: \_\_\_\_\_]☒ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information****Superseding to Case No:** 18-CR-20523**Judge:** Thomas L. Ludington

- ☐ Original case was terminated; no additional charges or defendants.
- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☒ Embraces same subject matter but adds the additional defendants or charges below:

**Defendant name****Charges**  
18 U.S.C. §§ 1591(a)**Prior Complaint (if applicable)****Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**May 8, 2019

Date

s/CHRISTOPHER W. RAWSTHORNE

Christopher W. Rawsthorne  
 Assistant United States Attorney  
 210 Federal Building  
 600 Church Street  
 Flint, Michigan 48502  
 Telephone: (810) 766-5177  
 Email: Christopher.Rawsthorne@usdoj.gov  
 WI BAR# 1059889

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.